

October 7, 2019

Chairman Ajit Pai
Office of Chairman
Federal Communications Commission
445 12th Street, SW
Washington DC 20554.

RE: Boulder Regional Emergency Telephone Service Authority Petitions
PS Docket 19-254

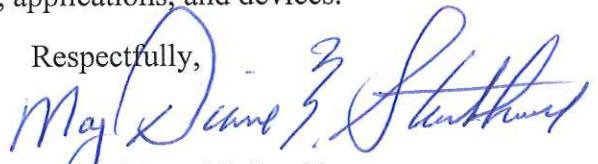
Dear Chairman Pai:

On November 18, 2018, the Boulder Regional Emergency Telephone Service Authority ("BRETSA") filed petitions with the FCC asking for FirstNet to support interoperability with other networks used by public safety agencies and to consider rules for ensuring interoperability between FirstNet and other service providers. On September 11, 2019, the FCC released a Public Notice asking for public comment on those petitions. Pennsylvania FirstNet (PA-FirstNet) supports BRETSA's requests and asks the FCC to grant them.

Interoperable communications are vital to support public safety's mission-critical operations. Based upon broadband coverage, first responders may subscribe to carriers other than AT&T/FirstNet. When first responders arrive on the scene of an incident, they must be able to communicate with all other responders, regardless of what network or service they use. It doesn't merely mean that a responder on one network can make a phone call, or deliver a data file, to a responder on another network. It means that the networks these responders use must follow the same priority protocols to ensure that all affected network operators treat the communication with the level of priority that is appropriate for the mission. And, it means that public safety applications, such as Mission Critical Push-to-Talk (MCPTT), must work consistently for all responders regardless of the network they use. A lack of interoperability risks failure in communications, impedes emergency response, and could threaten the lives of first responders and the citizens they're sworn to protect.

FirstNet was created to ensure reliable, effective, and interoperable communications for the nation's first responders. PA-FirstNet believes that FirstNet cannot fulfill that mission without ensuring that first responders using its network can communicate, without limitation, with responders on other networks. We urge the FCC to grant BRETSA's requests and to take what other actions might be necessary to ensure interoperability for public safety communications at all levels, including network, services, applications, and devices.

Respectfully,



Major Diane M. Stackhouse
PA-FirstNet Single Point of Contact